Friant
WATER AUTHORITY

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May 20, 2021

Eileen Sobeck
Executive Director
State Water Resources Control Board
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Subject: 2021 Draft Sacramento River Temperature Management Plan

Dear Ms. Sobeck:

On May 5, the Bureau of Reclamation (Reclamation) submitted the Water Year 2021 Draft Sacramento River Temperature Management Plan (TMP) to the State Water Resources Control Board (SWRCB) pursuant to the 2020 Record of Decision and 2019 Biological Opinions on the Coordinated Long-Term Operation of the Central Valley Project (CVP) and State Water Project (SWP). This draft plan was shared for review purposes as a courtesy to the State Water Resources Board prior to the development and submittal of the final Sacramento River Temperature Management Plan. Upon reviewing the draft plan, Friant Water Authority (FWA) would like to submit comments for your consideration as you engage with the Sacramento Temperature Management Task Force in completion of the final TMP.

As with so many aspects of California water management, the decisions State and Federal agencies make this year regarding Central Valley Project (CVP) operations will carry enormous impacts for humans and the environment elsewhere in the state.

Our members are Friant Division contractors of the CVP, all of whom draw some of their water supplies from the San Joaquin River and stored at Millerton Lake. The Friant Division's water supply was made possible by purchase and exchange agreements between Reclamation and the original riparian water users of the San Joaquin River. Part of those agreements allow for these water users, the Exchange Contractors, to call on their reserved rights to the San Joaquin River when Sacramento River supplies cannot be delivered to them from the Sacramento-San Joaquin Delta (Delta) via Jones Pumping Plant and through the Delta-Mendota Canal. Such has happened twice in the history of the CVP, in 2014 and 2015, and in both years the Exchange Contractors instead received their water supplies from Millerton Lake. In a year such as 2021, which will meet or eclipse even the driest years on record for California, implementing operational conditions beyond the Draft Sacramento River TMP will reduce Sacramento River exports from the Delta enough

to again trigger a "call" by the Exchange Contractors for their historical water rights behind Friant Dam.

Aside from impacting water supplies for Friant Division contractors, delivery of Friant supplies to the San Joaquin River Exchange Contractors would carry additional unintended consequences notes below.

1. Exacerbated Drinking Water Supply and Quality Problems in the San Joaquin Valley. The Friant Division was designed to both provide water for irrigation and municipal uses, and to stabilize groundwater levels on the eastside of the southern San Joaquin Valley. A call on Friant supplies at Millerton Lake would reduce the amount of surface water delivered for irrigation and groundwater recharge throughout these Friant Division service area, which includes more than 55 disadvantaged or severely disadvantaged communities that are almost entirely reliant on groundwater wells for their supplies. More than 1 million Californians live in these communities, and many of them already have unsafe drinking water or experienced their wells going dry during 2014 and 2015; both problems will inevitably be exacerbated with fewer surface flows infiltrating the valley's groundwater aquifers.

2. Severe Threats to Reestablishment of Spring-Run Chinook Salmon Population Below Friant Dam. Friant Division contractors are parties to a settlement agreement to restore self-sustaining Chinook salmon populations to the San Joaquin River downstream of Friant Dam, the operation of which was responsible for extirpating the second-largest salmon run in California in the mid-20th century.[1] In 2014, the San Joaquin River Restoration Program began reintroducing Spring-run Chinook salmon to the San Joaquin River; in 2017, Spring-run began returning to spawn in the river for the first time in nearly 70 years. As of May 10, 64 individual Spring-run had returned this year to spawn below Friant Dam. In combination with this year's extremely poor hydrologic conditions, a call on Friant supplies at Millerton Lake could reduce the cold-water pool behind Friant Dam through the fall months, increasing temperature-dependent mortality of spawning salmon. There are also risks of the San Joaquin River drying up past Sack Dam or for poorly-timed releases into Mendota Pool dewatering redds just below Friant Dam. Any of these outcomes would have devastating effects to this burgeoning salmon population that the federal and state governments, Friant contractors, and environmental groups have worked very hard to reestablish as a goal of the San Joaquin River Restoration Settlement. It is critical for the SWRCB to understand that in prioritizing the survivability of one of California's struggling salmonid species this year, they are delivering a potentially fatal blow to the successful reestablishment of another.

[1] The SWRCB acknowledged the contributions of the San Joaquin River Restoration Program to flows and water quality conditions at Vernalis in its July 2018 Final Proposed Amendments and Supplemental Environmental Document for the Bay-Delta Water Quality Control Plan, and as a result did not seek additional flows from the San Joaquin River above the Merced River confluence. (See Chapter 2 "Water Resources," page 2-9.)

FWA understands that both Reclamation and the SWRCB have statutory and regulatory requirements to minimize impacts to listed species from water project operations, but we urge you to consider the broad context for your decisions and the potential they carry for collateral damage.

As such, FWA also urges the SWRCB to exercise its authority and immediately curtail diversions by junior water rights holders. The need to protect species and their habitat this year must not be met predominantly by State and Federal water users alone.

Please contact us with any questions on the above comments. We always stand ready to provide input on how to craft equitable and balanced solutions during extreme drought conditions.

Sincerely,

Jason Phillips
Chief Executive Officer